

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AHMED ASHOUR, JOY BROWN, and
CRYSTAL TOWNES, individually and
on behalf of all others similarly situated,

Plaintiffs,

vs.

ARIZONA BEVERAGES USA LLC,
HORNELL BREWING CO., INC.,
BEVERAGE MARKETING USA,
INC., ARIZONA BEVERAGES
HOLDINGS LLC, and ARIZONA
BEVERAGES HOLDINGS 2 LLC,

Defendants.

CASE NO. 1:19-cv-07081-(AT) (OTW)

JOINT LIST OF DOCUMENTS REQUESTED TO BE FILED UNDER SEAL

Pursuant to the Court's Order requesting that the Parties shall jointly provide a list of all documents they seek to seal (with citations to the ECF docket), which Party requests sealing, and whether the opposing Party objects by May 14, 2024 (ECF No. 335), the Parties jointly submit the following:¹

| NAME OF DOCUMENT | ECF NO. (UNDER SEAL) | ECF NO. (PUBLIC/ REDACTED/ PLACE-HOLDER) | PARTY REQUESTING SEAL | WHETHER OPPOSING PARTY OBJECTS |
|-------------------------------------------------------------|-----------------------------|-------------------------------------------------|------------------------------|-----------------------------------------------------|
| Defendants' Brief in Support of Motion for Summary Judgment | 317 | 313-23 | Defendants. | Plaintiffs do not object to Defendants' redactions. |
| Defendants' Rule 56.1 Statement | 317-1 | 313-24 | Defendants. | Plaintiffs do not object to Defendants' redactions. |

¹ The Parties will submit proposed redactions in the event the Court so directs and under seal if necessary.

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|---------------------------------------------------|-----------------------------|-------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Notice of Motion and Motion for Summary Judgment | 314 | N/A | N/A; Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Proposed Order | 314-1 | N/A | N/A; Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Deposition Transcript of Ahmed Ashour | 315-1 | 313-1 | Plaintiffs request redaction of Ahmed Ashour's private information. | Defendants do not object. |
| Deposition Transcript of Crystal Townes | 315-2 | 313-2 | Plaintiffs request redaction of Crystal Townes' private information. | Defendants do not object. |
| Deposition Transcript of Joy Brown | 315-3 | 313-3 | Plaintiffs request redaction of Joy Brown's private information. | Defendants do not object. |
| Retainer Agreement of Joy Brown | 315-4 | 313-4 | Plaintiffs request seal as it contains sensitive financial information of Joy Brown. | Defendants do not object. |
| Retainer Agreement of Crystal Townes | 315-5 | 313-5 | Plaintiffs request seal as it contains sensitive financial information of Crystal Townes. | Defendants do not object. |
| Don Vultaggio's 30(b)(6) Deposition Transcript | 315-20 | 313-20 | Defendants request to seal proposed redactions. | Plaintiffs object to sealing of document and further object to Defendants' proposed redactions. |
| Deposition Exhibit P-10 | 315-21 | 313-21 | Defendants. | Plaintiffs object. |
| Ex. A to the Don Vultaggio Declaration – Invoices | 316-1 | 312-1 | Defendants. | Plaintiffs do not object. |

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|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Supplemental Donovan Declaration | 320 | N/A | N/A; Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Exhibit 1 - Errata Sheet to Brown Deposition Transcript | 320-1 | N/A | N/A; Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Second Supplemental Donovan Declaration | 321 | N/A | N/A; Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Exhibit A – Signature Page | 321-1 | N/A | N/A; Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Plaintiffs’ Response to Defendants’ Rule 56.1 Statement | 328 | N/A | Defendants. ² | Plaintiffs object and request to seal redactions. |
| Plaintiffs’ Memorandum in Opposition to Defendants’ Motion for Summary Judgment | 330 | 329 | Defendants. ³ | Plaintiffs object and request to seal redactions in accordance with ECF No. 329. |
| Plaintiff’s Supplemental Responses and Objections to Defendants’ Initial Interrogatories to Plaintiff Ahmed Ashour, dated Aug. 24, 2020 | 333-1 | 332-1 | Plaintiffs request redaction of Plaintiff Ashour’s private information at Answer to Interrogatory No. 19 in accordance with ECF No. 332-1. | Defendants do not object. |

² Plaintiffs filed their Response to Defendants’ Rule 56.1 Statement under seal in accordance with the protective order, Defendants’ objections, and out of an overabundance of caution. Plaintiffs do not believe the document should be sealed in its entirety, but should be redacted.

³ Plaintiffs filed their Memorandum in Opposition to Defendants’ Motion for Summary Judgment under seal in accordance with the protective order, Defendants’ objections, and out of an overabundance of caution. Plaintiffs do not believe the document should be sealed in its entirety, but should be redacted.

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| D-IRI-0001 | 333-2 | 332-2 | Plaintiffs. | Defendants do not object. |
| Plaintiff's Amended Responses and Objections to Defendants' Initial Interrogatories to Plaintiff Joy Brown, dated Oct. 27, 2021 | 333-3 | 332-4 | Plaintiffs request redaction of Plaintiff Brown's private information at Answer to Interrogatory No. 15. | Defendants do not object. |
| KNOUSE001722 | 333-4 | 332-5 | Defendants. | Plaintiffs object. |
| DESI063305-10 | 333-5 | 332-6 | Defendants. | Plaintiffs object. |
| DESI017298-308 | 333-6 | 332-7 | Defendants. | Plaintiffs object. |
| AFI 0000704-5; 597-8 | 333-7 | 332-8 | Defendants. | Plaintiffs object. |
| NIAGARA000261-64; 543-7 | 333-8 | 332-9 | Defendants. | Plaintiffs object. |
| Defendants' Rule 26(a)(1) Initial Disclosures, dated May 13, 2020 | 333-9 | 332-10 | Defendants withdraw request. | Plaintiffs object to any redactions or sealing. |
| Defendants' Rule 26(a)(1) Initial Disclosures, dated June 9, 2020 | 333-10 | 332-11 | Defendants request to seal proposed redactions. | Plaintiffs object to sealing of document and further object to Defendants' proposed redactions. |
| DESI038104 | 333-11 | 332-12 | Plaintiffs. | Defendants do not object. |
| DESI013465-6 | 333-12 | 332-13 | Plaintiffs. | Defendants do not object. |
| DESI011245-9; DESI013467 | 333-13 | 332-14 | Plaintiffs. | Defendants do not object. |
| DESI013639 | 333-14 | 332-15 | Plaintiffs. | Defendants do not object. |
| DESI013841; DESI014006 | 333-15 | 332-16 | Plaintiffs. | Defendants do not object. |
| Defendants' Objections and Responses to Plaintiff Ashour's | 333-16 | 332-17 | Defendants request to seal proposed redactions. | Plaintiffs object. |

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| First Set of Interrogatories, dated July 30, 2020 | | | | |
| Defendants' Supplemental and Superseding Objections and Responses to Questions Numbers 1 and 5 of Plaintiff Ashour's First Set of Interrogatories, dated February 8, 2021 | 333-17 | 332-18 | Defendants request to seal proposed redactions. | Plaintiffs object. |
| Defendants' Amended Objections and Responses to Plaintiff Crystal Townes' Second Set of Interrogatories, dated July 7, 2023 | 333-18 | 332-21 | Defendants request to seal proposed redactions. | Plaintiffs object. |
| Defendants' Objections and Responses to Plaintiff Joy Brown's Interrogatories, dated November 3, 2023 | 333-19 | 332-22 | Defendants request to seal proposed redactions. | Plaintiffs object. |
| Defendants' Objections and Responses to Plaintiffs' Requests for Admissions, Set I, dated September 22, 2023 | 333-20 | 332-23 | Defendants request to seal proposed redactions. | Plaintiffs object. |
| Defendants' Objections and Responses to | 333-21 | 332-24 | Defendants request to seal proposed redactions. | Plaintiffs object. |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Plaintiff Ashour's First Request for Production of Documents, dated July 31, 2020 | | | | |
| Defendants' First Supplemental Objections and Responses to Plaintiff Ashour's First Request for Production of Documents Request Numbers 7-10, 13, 15, 17-20, 23, 25-30, 32, 34 and 35, dated November 6, 2020 | 333-22 | 332-25 | Defendants request to seal proposed redactions. | Plaintiffs object. |
| DESI018863-5 | 333-23 | 332-27 | Defendants. | Plaintiffs object. |
| DESI061511 | 333-24 | 332-28 | Defendants. | Plaintiffs object. |
| Defendants' Reply Memorandum of Law in Support of Motion for Summary Judgment | 343 | 342 | Defendants request to seal redactions in accordance with ECF No. 342. | Plaintiffs object to sealing of document and further object to Defendants' proposed redactions. |

Dated: May 14, 2024

/s/ Melissa S. Weiner

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